September 12, 2022

Hannah Pell TMI-2 Energy Solutions 121 W Trade Street Suite 2700 Charlotte PA 282020000

RE: ER Project # 2021PR03278.002, TMI-2 Decommissioning Project, Dauphin County, Pennsylvania, Nuclear Regulatory Commission, Conoy Township, Lancaster County

Dear Hannah Pell:

Thank you for submitting information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources.

## **Above Ground Resources**

More Information Requested - Update Existing Resource

Additional questions: TMI construction was delayed by worker strikes and environmental concerns being raised. Is there additional significance here under Labor History? What changes were physically made to the property to address the environmental concerns? - What is the significance of the public outreach campaigns that occurred when the plant opened? The borough of Donorra has additional significance as the affected area from a industrial disaster - why would Middletown not have similar significance/add to the boundary? The TMI-2 Control Room was also identified as a contributing factor to the accident, stating the control room is huge, with hundreds of alarms, and there are some key indicators placed in locations where the operators cannot see them; and that lessons from previous accidents did not result in new, clear instructions being passed on to the operators. Were corrections to this made at TMI-1? What physically changed in nuclear stations as a result of this incident? Please submit the requested materials to the PA SHPO through PA-SHARE using the link under SHPO Requests More Information on the Response screen.

More Information Requested - Update Existing Resource

The information provided comes from a place of recommending ONLY TMI-2 as the resource. However, the historically associated property is ALL of TMI, which the PA SHPO had stated in various phone calls. 1. Therefore, it is unclear why there is an arbitrary non-

contiguous boundary when the resource should be the entire plant. Roads, bridges, spaces between buildings, etc - all should be included. This information provided comes from a place of a previously proposed POS of a very narrow time frame, the PA SHPO is requesting a document that discusses the POS as the time frame in which the plant operated. Please submit the requested materials to the PA SHPO through PA-SHARE using the link under SHPO Requests More Information on the Response screen.

For questions concerning above ground resources, please contact Cheryl Nagle at chnagle@pa.gov.

Sincerely,

Emma Diehl

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**Environmental Review Division Manager**